

U.S. PRODUCERS' QUESTIONNAIRE

**PURIFIED CARBOXYMETHYLCELLULOSE FROM FINLAND,
MEXICO, NETHERLANDS, AND SWEDEN**

This questionnaire must be received by the Commission by no later than December 3, 2010

See page 4 of the Instruction Booklet for filing instructions.

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its review of the antidumping duty orders concerning purified carboxymethylcellulose ("purified CMC") from Finland, Mexico, Netherlands, and Sweden (Invs. Nos. 731-TA-1084-1087 (Review)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, title VII. **This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).**

<p>Name of firm _____</p> <p>Address _____</p> <p>City _____ State _____ Zip Code _____</p> <p>World Wide Web address _____</p> <p>Has your firm produced purified carboxymethylcellulose (as defined in the instruction booklet) at any time since January 1, 2005?</p> <p><input type="checkbox"/> NO (Sign the certification below and promptly return only this page of the questionnaire to the Commission)</p> <p><input type="checkbox"/> YES (Read the instruction booklet carefully, complete all parts of the questionnaire, and return the entire questionnaire to the Commission so as to be received by the date indicated above)</p>
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CERTIFICATION

I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission.

By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout these reviews in any other import-injury proceedings or reviews conducted by the Commission on the same or similar merchandise.

I acknowledge that information submitted in this questionnaire response and throughout these reviews may be used by the Commission, its employees, and contract personnel who are acting in the capacity of Commission employees, for developing or maintaining the records of these reviews or related proceedings for which this information is submitted, or in internal audits and proceedings relating to the programs and operations of the Commission pursuant to 5 U.S.C. Appendix 3. I understand that all contract personnel will sign non-disclosure agreements.

_____ Name of Authorized Official	_____ Title of Authorized Official	_____ Date
_____ Signature	_____ Phone: ()	_____ E-mail address
	_____ Fax ()	

PART I.—GENERAL INFORMATION

The questions in this questionnaire have been reviewed with market participants to ensure that issues of concern are adequately addressed and that data requests are sufficient, meaningful, and as limited as possible. Public reporting burden for this questionnaire is estimated to average 50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the questionnaire. Send comments regarding the accuracy of this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Investigations, U.S. International Trade Commission, 500 E Street, SW, Washington, DC 20436.

I-1a. **OMB statistics.**--Please report below the actual number of hours required and the cost to your firm of preparing the reply to this questionnaire and completing the form.

_____hours _____dollars

I-1b. **OMB feedback.**--We are interested in any comments you may have for improving this questionnaire in general or the clarity of specific questions. Please attach such comments to your response or send them to the above address.

I-2. **Establishments covered.**--Provide the name and address of establishment(s) covered by this questionnaire (see page 3 of the instruction booklet for reporting guidelines). If your firm is publicly traded, please specify the stock exchange and trading symbol.

I-3. **Support for continuation of order.**--Do you support or oppose continuation of the antidumping and/or countervailing duty order currently in place for purified CMC from the following countries?

Finland	<input type="checkbox"/> Support	<input type="checkbox"/> Oppose	<input type="checkbox"/> Take no position
Mexico	<input type="checkbox"/> Support	<input type="checkbox"/> Oppose	<input type="checkbox"/> Take no position
Netherlands	<input type="checkbox"/> Support	<input type="checkbox"/> Oppose	<input type="checkbox"/> Take no position
Sweden	<input type="checkbox"/> Support	<input type="checkbox"/> Oppose	<input type="checkbox"/> Take no position

PART I.--GENERAL INFORMATION--Continued

I-4. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

No Yes--List the following information.

<u>Firm name</u>	<u>Address</u>	<u>Extent of ownership</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-5. **Related SUBJECT importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing purified CMC from Finland, Mexico, Netherlands, or Sweden into the United States or which are engaged in exporting purified CMC from Finland, Mexico, Netherlands, or Sweden to the United States?

No Yes--List the following information.

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-6. **Related NONSUBJECT importers/exporters.**--Does your firm have any related firms, either domestic or foreign, which are engaged in importing purified CMC from countries other than Finland, Mexico, Netherlands, or Sweden into the United States or which are engaged in exporting purified CMC from countries other than Finland, Mexico, Netherlands, or Sweden to the United States?

No Yes--List the following information.

<u>Firm name and country</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

PART I.--GENERAL INFORMATION--Continued

I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, which are engaged in the production of purified CMC?

No Yes--List the following information.

<u>Firm name</u>	<u>Address</u>	<u>Affiliation</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

I-8. **Business plan.**--In Parts II and IV of this questionnaire we request a copy of your company's business plan. Does your company or any related firm have a business plan or any internal documents that describe, discuss, or analyze expected market conditions for purified CMC?

No Yes--Please provide the requested documents. If you are not providing the requested documents, please explain why not.

PART II.--TRADE AND RELATED INFORMATION

Further information on this part of the questionnaire can be obtained from **Cynthia Trainor (202-205-3354, cynthia.trainor@usitc.gov)**. **Supply all data requested on a calendar-year basis.**

II-1. Please identify the individual to be contacted regarding the confidential information requested in part II?

Name and title: _____

Please indicate the manner by which Commission staff may contact the individual responsible for part II with questions regarding the submitted confidential information

E-mail: _____ Telephone: (____) _____

Fax: (____) _____

II-2. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of purified CMC since January 1, 2005.

(check as many as appropriate)

(please describe)

plant openings _____

plant closings..... _____

relocations _____

expansions _____

acquisitions..... _____

consolidations..... _____

prolonged shutdowns or
production curtailments _____

revised labor agreements..... _____

other (*e.g.*, technology) _____

PART II.--TRADE AND RELATED INFORMATION--Continued

II-3. **Anticipated changes in operations.**--Does your firm anticipate any changes in the character of your operations or organization (as noted above) relating to the production of purified CMC in the future?

- No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue. **Include in your response a specific projection of your firm's capacity to produce purified CMC (in 1,000 pounds) for 2011 and 2012.**

For question II-4, if your response differs for particular orders, please indicate and explain the particular effect of revocation of specific orders.

II-4. **Anticipated changes in operations in the event the order is revoked.**--Would your firm anticipate any changes in the character of your operations or organization (as noted above) relating to the production of purified CMC in the future if the antidumping duty orders on purified CMC from Finland, Mexico, Netherlands, or Sweden were to be revoked?

- No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART II.--TRADE AND RELATED INFORMATION--Continued

II-5. **Same equipment, machinery, and workers.**--Has your firm since 2005 produced, or does your firm anticipate producing in the future, other products on the same equipment and machinery used in the production of purified CMC and/or using the same production and related workers employed to produce purified CMC?

- No Yes--List the following information and report your firm's combined production capacity and production of these products and purified CMC in the periods indicated.

<u>Product</u>	<u>Period</u>	<u>Basis for allocation of capacity and employment data (indicate if different)</u>
Purified CMC _____	_____	_____
_____	_____	_____
_____	_____	_____

<i>(Quantity in 1,000 pounds)</i>					
Item	2005	2006	2007	2008	2009
Overall Production Capacity					
Production of:					
Purified CMC					
Other product 1					
Other product 2					

II-6. **Constraints on production.**--Please describe the constraint(s) that set the limit(s) on your production capacity.

II-7. **Production shifting.**--Is your firm able to switch production between purified CMC and other products in response to a relative change in the price of purified CMC vis-a-vis the price of other products, using the same equipment and labor?

- No Yes--Please identify the other products, the approximate time and cost involved in switching, and the minimum relative price change required for your firm to switch production to or from purified CMC.

PART II.--TRADE AND RELATED INFORMATION--Continued

II-8. **Trade data.**--Report your firm's production capacity, production, shipments, inventories, and employment related to the production of purified CMC in your U.S. establishment(s) during the specified periods. (See definitions in the instruction booklet.)

Quantity (in 1,000 pounds) and value (in \$1,000)							
Item	Calendar year					January-September	
	2005	2006	2007	2008	2009	2009	2010
Average production capacity ¹ (quantity) (A)							
Beginning-of-period inventories (quantity) (B)							
Production (quantity) (C)							
U.S. shipments:							
Commercial shipments:							
quantity (D)							
value (E)							
Internal consumption: ²							
quantity (F)							
value (G)							
Transfers to related firms: ²							
quantity (H)							
value (I)							
Export shipments: ³							
quantity (J)							
value (K)							
End-of-period inventories (quantity) (L)							
Channels of distribution:							
U.S. shipments to distributors (quantity) (M)							
U.S. shipments to end users (quantity) (N)							
Employment data:							
Average number of PRWs (number) (O)							
Hours worked by PRWs (1,000 hours) (P)							
Wages paid to PRWs (value) (Q)							

¹ The production capacity (see definitions in instruction booklet) reported is based on operating ____ hours per week, ____ weeks per year. Please describe the methodology used to calculate production capacity, and explain any changes in reported capacity (use additional pages as necessary).

² Internal consumption and transfers to related firms should be valued at fair market value. In the event that you use a different basis for valuing these transactions, please specify that basis (e.g., cost, cost plus, etc.) and provide value data using that basis for each of the periods noted above:

³ Identify your principal export markets: _____.

PART II.--TRADE AND RELATED INFORMATION--Continued

II-9. Reconciliation of trade data.--

- (a) Please note that the quantities reported in question II-10 should reconcile as follows in each period (*i.e.*, in each column):

Reconciliation

$B + C - D - F - H - J = L$

Do these data reconcile? Yes No--Please explain _____

$D + F + H = M + N$

Do these data reconcile? Yes No--Please explain _____

- (b) Please note that the quantities reported for end of period inventories should equal the beginning of period inventories reported in the subsequent calendar year (*i.e.*, line L of year 2005 should equal line B of year 2006). Do these data reconcile for each adjacent calendar year?

Yes. No--Please explain.

- II-10. **Transfers to related firms.**--If you reported transfers to related firms in question II-8, please indicate the nature of the relationship between your firm and the related firms (*e.g.*, joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

PART II.--TRADE AND RELATED INFORMATION--Continued

II-11. **U.S. shipments by end use.**—Report your firm's U.S. shipments (commercial shipments and internal consumption and transfers of purified CMC), by major end use.

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>							
Item	Calendar years					January-September	
	2005	2006	2007	2008	2009	2009	2010
FOOD:¹							
<i>Quantity</i>							
<i>Value</i>							
PERSONAL CARE, COSMETICS & PHARMACEUTICALS:¹							
<i>Quantity</i>							
<i>Value</i>							
PAPER & BOARD:¹							
<i>Quantity</i>							
<i>Value</i>							
OIL FIELD:¹							
<i>Quantity</i>							
<i>Value</i>							
ALL OTHER:²							
<i>Quantity</i>							
<i>Value</i>							
TOTAL U.S. SHIPMENTS:³							
<i>Quantity</i>							
<i>Value</i>							
¹ Please indicate the ranges of key product characteristics for reported U.S. shipments during 2009 as follows: <div style="text-align: center;">Purity (percent)</div> Food _____ Personal care, cosmetics, . . . _____ & pharmaceuticals Oilfield _____ Other _____							
² Please describe: _____							
³ U.S. shipment data (commercial shipments + internal consumption + transfers) should reconcile with data reported in section II-8.							

PART II.--TRADE AND RELATED INFORMATION--Continued

II-12. **Purchases.**--Other than direct imports, has your firm otherwise purchased purified CMC since January 1, 2005? (See definitions in the instruction booklet.)

- No Yes-- Please indicate the reasons for your purchases (if your reasons differ by source, please elaborate) and report the quantity and value of such purchases below for the specified periods

Reasons: _____

<i>(Quantity in 1,000 pounds, value in \$1,000)</i>						
Item	2005	2006	2007	2008	2009	January-September 2010
PURCHASES FROM U.S. IMPORTERS¹ OF PURIFIED CMC FROM.—						
FINLAND:						
<i>quantity</i>						
<i>value</i>						
MEXICO:						
<i>quantity</i>						
<i>value</i>						
NETHERLANDS:						
<i>quantity</i>						
<i>value</i>						
SWEDEN:						
<i>quantity</i>						
<i>value</i>						
All other countries:						
<i>quantity</i>						
<i>value</i>						
PURCHASES FROM DOMESTIC PRODUCERS:²						
<i>quantity</i>						
<i>value</i>						
PURCHASES FROM OTHER SOURCES:						
<i>quantity</i>						
<i>Value</i>						
¹ Please list the name of the importer(s) from which you purchased this product. If your suppliers differ by source, please identify the source for each listed supplier. _____ _____						
² Please list the name of the domestic producer(s) from which you purchased this product. _____ _____						

II-13. **Toll production.**--Since January 1, 2005, has your firm been involved in a toll agreement (see definition in the instruction booklet) regarding the production of purified CMC?

- No Yes--Name firm(s): _____.

PART II.--TRADE AND RELATED INFORMATION--Continued

II-14. **FTZ.**--Does your firm produce purified CMC in a foreign trade zone (FTZ)?

No Yes--Identify FTZ(s): _____.

II-15. **Direct imports.**--Since January 1, 2005, has your firm imported purified CMC?

No Yes--**COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE**

For questions II-16 and II-17, if your response differs for particular orders, please indicate and explain the particular effect of imposition and/or revocation of specific orders.

II-16. **Effect of order.**--Describe the significance of the existing antidumping duty orders covering imports of purified CMC from Finland, Mexico, Netherlands, and Sweden in terms of their effect on your firm's production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, and asset values. You may wish to compare your firm's operations before and after the imposition of the order.

II-17. **Likely effect of revocation of order.**--Would your firm anticipate any changes in its production capacity, production, U.S. shipments, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of purified CMC in the future if the antidumping duty orders on purified CMC from Finland, Mexico, Netherlands, and Sweden were to be revoked?

No Yes--Supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation for any trends or projections you may provide.

PART III.--FINANCIAL INFORMATION

Address questions on this part of the questionnaire to **Mary Klir (202-205-3247, mary.klir@usitc.gov)**.

III-1. Please identify the individual to be contacted regarding the confidential information requested in part III?

Name and title: _____

Please indicate the manner by which Commission staff may contact the individual responsible for part III with questions regarding the submitted confidential information.

E-mail: _____ Telephone: () _____

Fax: () _____

III-2. **Accounting system.**--Briefly describe your financial accounting system.

A. When does your fiscal year end (month and day)? _____

If your fiscal year changed during the period examined, explain below: _____

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include subject merchandise: _____

2. Does your firm prepare profit/loss statements for the subject merchandise:

Yes No

3. How often did your firm (or parent company) prepare financial statements (including annual reports, 10Ks)? Please check relevant items below.

Audited, unaudited, annual reports, 10Ks, 10Qs,

Monthly, quarterly, semi-annually, annually

4. Accounting basis: GAAP, cash, tax, or other comprehensive (specify) _____

Note: The Commission may request that your company submit copies of its financial statements, including internal profit-and-loss statements for the division or product group that includes purified CMC, as well as those statements and worksheets used to compile data for your firm's questionnaire response.

III-3. **Cost accounting system.**--Briefly describe your cost accounting system (e.g., standard cost, job order cost, etc.).

III-4. **Allocation basis.**--Briefly describe your allocation basis, if any, for COGS, SG&A, and interest expense and other income and expenses.

PART III.--FINANCIAL INFORMATION--Continued

III-5. **Other products.**--Please list any other products you produced in the facilities in which you produced purified CMC, and provide the share of net sales accounted for by these other products in your most recent fiscal year:

<u>Products</u>	<u>Share of sales</u>
Purified CMC _____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III-6. **Raw materials from related firms.**--Does your company receive inputs (raw materials, labor, energy, or any other services) used in the production of purified CMC from any related parties?

Yes--Continue to question III-7 below No--Continue to question III-9 below

III-7. **Inputs from related firms.**--In the space provided below, identify the inputs used in the production of purified CMC that your firm receives from related parties.

<u>Input</u>	<u>Related party</u>
_____	_____
_____	_____
_____	_____
_____	_____

III-8. **Related firms financials.**--With respect to the related parties identified in response to question III-7 above, are their financial statements consolidated with your firm's financial statements? (In other words, are profits or losses arising from intercompany transactions eliminated?)

Yes—Continue to question III-9 below. No--Continue to question III-10 below.

PART III.--FINANCIAL INFORMATION--Continued

III-9. **Inputs from related firms at cost.**--All intercompany profit on inputs purchased from related parties that is eliminated pursuant to formal financial statement consolidation should also be eliminated from the costs reported to the Commission in question III-11 (i.e., costs reported in question III-11, to the extent that they reflect inputs purchased from related parties, should only reflect the related party's cost and not include an associated profit component). Reasonable methods for determining and eliminating the associated profit on inputs purchased from related parties are acceptable.

Has your firm complied with the Commission's instructions regarding costs associated with inputs purchased from related parties?

Yes No

III-10. **Nonrecurring charges.**--For each annual and interim period for which financial results are reported in question III-11, please indicate in the schedule below the specific nonrecurring charges, the particular expense/cost line items from question III-11 where the associated charges are included, a brief description of the charges, and the associated values (*in \$1,000*). Nonrecurring charges would include, but are not limited to, items such as asset write-offs and accelerated depreciation due to restructuring of the company's purified CMC operations.

Item	Fiscal years ended--					January-September	
	_____	_____	_____	_____	_____	2009	2010
Non-recurring charges: (In the far left column please provide a brief description of each nonrecurring charge and indicate the particular expense/cost line items where the associated charges are included in question III-10.)							
1.							
2.							
3.							
4.							
5.							
6.							
7.							

PART III.--FINANCIAL INFORMATION--Continued

III-11. **Operations on purified CMC.**--Report the revenue and related cost information requested below on the purified CMC operations of your U.S. establishment(s).¹ **Do not report resales of products. Note that internal consumption and transfers to related firms must be valued at fair market value and purchases from related firms must be at cost.**² Provide data for your six most recently completed fiscal years in chronological order from left to right, and for the specified interim periods (see next page). If your firm was involved in tolling operations (either as the toller or as the tollee) please contact **Mary Klir at (202) 205-3247** before completing this section of the questionnaire.

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	_____	_____	_____	_____	_____
Net sales quantities: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities					
Net sales values: ³					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values					
Cost of goods sold (COGS): ⁴					
Raw materials					
Direct labor					
Other factory costs					
Total COGS					
Gross profit or (loss)					
Selling, general, and administrative (SG&A) expenses:					
Selling expenses					
General and administrative expenses					
Total SG&A expenses					
Operating income (loss)					
Other income and expenses:					
Interest expense					
All other expense items					
Continued Dumping and Subsidy Offset Act funds received ⁵					
All other income items					
All other income or expenses, net					
Net income or (loss) before income taxes					
Depreciation/amortization included above					

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

² Please indicate the amount of profits or (losses) on inputs from related firms that were eliminated pursuant question III-8: Year 1 _____ Year 2 _____ Year 3 _____ Year 4 _____ Year 5 _____.

³ Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

⁴ COGS should include costs associated with internal consumption and transfers to related firms.

⁵ Please report funds received under this act in the period(s) in which they were received. Do not report these funds as an offset to operating expenses.

PART III.--FINANCIAL INFORMATION--Continued

III-11. Operations on purified CMC--Continued

Quantity (in 1,000 pounds) and value (in \$1,000)		
Item	January-September 2009	January-September 2010
Net sales quantities: ³		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales quantities		
Net sales values: ³		
Commercial sales		
Internal consumption		
Transfers to related firms		
Total net sales values		
Cost of goods sold (COGS): ⁴		
Raw materials		
Direct labor		
Other factory costs		
Total COGS		
Gross profit or (loss)		
Selling, general, and administrative (SG&A) expenses:		
Selling expenses		
General and administrative expenses		
Total SG&A expenses		
Operating income (loss)		
Other income and expenses:		
Interest expense		
All other expense items		
Continued Dumping and Subsidy Offset Act funds received ⁵		
All other income items		
All other income or expenses, net		
Net income or (loss) before income taxes		
Depreciation/amortization included above		

¹ Include only sales (whether domestic or export) and costs related to your U.S. manufacturing operations.

² Please indicate the amount of profits or (losses) on inputs from related firms that were eliminated pursuant question III-8: January-September 2009 _____ January-September 2010 _____

³ Less discounts, returns, allowances, and prepaid freight. The quantities and values should approximate the corresponding shipment quantities and values reported in Part II of this questionnaire.

⁴ COGS should include costs associated with internal consumption and transfers to related firms.

⁵ Please report funds received under this act in the period(s) in which they were received. Do not report these funds as an offset to operating expenses.

PART III.--FINANCIAL INFORMATION--Continued

III-12. **Asset values.**--Report the total assets associated with the production, warehousing, and sale of purified CMC. If your firm does not maintain some or all of the specific asset data in the normal course of business, please estimate it based upon some rational method (such as production, sales, or costs) that is consistent with your cost allocations in the previous question. Your finished goods inventory value should reconcile with the inventory quantity data reported in Part II. Provide data as of the end of your six most recently completed fiscal years in chronological order from left to right.

Item	Value (in \$1,000)					January-September	
	_____	_____	_____	_____	_____	_____	_____
ASSETS associated with the production, warehousing, and sale of product:							
1. Current assets:							
A. Cash and equivalents							
B. Accounts receivable, net							
C. Inventories							
D. Other (describe: _____)							
E. Total current assets (lines 1.A. through 1.D.)							
2. Property, plant, and equipment							
A. Original cost of property, plant, and equipment							
B. Less: Accumulated depreciation							
C. Equals: Book value of property, plant, and equipment							
3. Other (describe: _____)							
4. Total assets (lines 1.E., 2.C., and 3)							

III-13. **Capital expenditures and research and development expenses.**--Report your firm's capital expenditures and research and development expenses on purified CMC. Provide data for your six most recently completed fiscal years in chronological order from left to right, and for the specified interim periods.

Item	Value (in \$1,000)						
	Calendar year					January-September	
	_____	_____	_____	_____	_____	2009	2010
Capital expenditures							
Research and development expenses							

PART IV.--PRICING AND MARKET FACTORS

Further information on this part of the questionnaire can be obtained from **Clark Workman (202-205-3248, clark.workman@usitc.gov)**

IV-1. Please identify the individual to be contacted regarding the confidential information requested in part IV.

Name and title: _____

Please indicate the manner by which Commission staff may contact the individual responsible for part IV with questions regarding the submitted confidential information.

E-mail: _____ Telephone: () _____

Fax: () _____

PRICE DATA

This section requests quarterly selling quantity and value data during January 2005-September 2010 for your firm's U.S. commercial shipments of the following purified CMC products that it produced domestically and shipped to U.S. **end users** unrelated to your firm by ownership.

Product 1.—High viscosity (approximately 1,000 to 3,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7HF; CP Kelco–Cekol 30,000; Akzo–Akucel AF278; Amtex–PE 31FG.

Product 2.—Very high viscosity (approximately 2,500 to 9,000 Mpas in 1 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7H4F and 9H4F; CP Kelco–Cekol 50,000; Akzo–Akucell 280X and 298X; Amtex–F1-4000 and F1-6000 (both formerly included in PE 32 FG).

Product 3.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), used for regulated (food or personal care) applications, excluding pharmaceutical. The trade names of the suppliers for this product are: Aqualon–7MF; CP Kelco–Cekol 700; Akzo–Akucel AF150 and AF 170; Amtex–F2 750.

Product 4.—Medium viscosity (approximately 400 to 800 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon–7MT; CP Kelco–Finnfix 700; Akzo–None; Amtex–P 2 750.

PART IV.--PRICING AND MARKET FACTORS--Continued

PRICE DATA--Continued

Product 5.—Low viscosity (approximately 20 to 1,000 Mpas in 4 percent solution, 5 to 100 Mpas in 2 percent solution), degree of substitution approximately 0.65 to 0.90 (i.e., 6.5 to 9.0 carboxymethyl groups per 10 anhydroglucose units), non-regulated applications (i.e., standard grade). The trade names of the suppliers for this product are: Aqualon (98 percent CMC minimum)—7L1, 7L2, and 7L; CP Kelco (98 percent CMC minimum)—Finnfix 5, Finnfix 10, and Finnfix 30; Akzo—None; Amtex (92 percent CMC minimum)—P2-10, P2-30, and P2-75.

Product 6.—High viscosity (minimum 1,500 Mpas in 1 percent solution), degree of substitution 0.8 to 1.5 (i.e., 8 to 15 carboxymethyl groups per 10 anhydroglucose units), to oilfield customers. This product is often sold to customers bearing the particular customer's trade name for its oil drilling product, such as Drispac, Milpac, and Polypac. Less frequently, the product bears a proprietary name of the manufacturer, such as Aqualon's Aquapac or Akzo's Staflo. In all cases, the specifications and not the label on the bag should be the controlling factor in reporting.

Please note that quarterly dollar selling values should be on a f.o.b. U.S. point(s)-of-shipment basis (including those shipped directly from your U.S. plant(s) and from your U.S. warehouse(s)) and should not include U.S.-inland transportation costs to your end-user customers. For any sales that were on a delivered basis, deduct from the delivered price all such U.S.-inland freight to your end-user customers and report the resulting effective f.o.b. U.S. sales values (*do not report transactions where you cannot report values, either actual or adjusted, on a f.o.b. basis*). Report the U.S. f.o.b. sales value and quantity data NET of returns, discounts, allowances, and rebates; also deduct any U.S. freight costs to your customers' receiving points that were absorbed by your firm (i.e., not charged to your customers). See *instruction booklet*.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-2. **Pricing data.**--Report below the quarterly price data¹ for the pricing products² produced and sold by your firm to end users.

(Quantity in pounds, value in dollars)						
Period of shipment	Product 1		Product 2		Product 3	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point(s) of shipment; the latter actual or adjusted.

² Pricing product definitions are provided on the first page of Part IV.

Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:

Product 1: _____

Product 2: _____

Product 3: _____

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-2. Pricing data.--Continued

(Quantity in pounds, value in dollars)						
Period of shipment	Product 4		Product 5		Product 6	
	Quantity	Value	Quantity	Value	Quantity	Value
2005:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2006:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2007:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2008						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2009:						
Jan-Mar						
Apr-June						
July-Sept						
Oct.-Dec						
2010:						
Jan-Mar						
Apr-June						
July-Sept						

¹ Net values (*i.e.*, gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your U.S. point(s) of shipment; the latter actual or adjusted.

² Pricing product definitions are provided on the first page of Part IV.

Note.--If your product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your product:

Product 4: _____

Product 5: _____

Product 6: _____

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-3. Pricing products.--

U.S. selling and import price comparability.— Is the U.S. producer's reported selling prices of the domestic purified CMC at a comparable level of the market as the reported import price data for the products from the subject countries reported by importing end users (i.e., is it appropriate to compare the selling prices of the domestic products with the import prices of the subject imported products reported by importing end users)?

No Yes

If no, please explain the reason(s) why, including any costs of importing purified CMC that were not reflected in the reported import price data.

IV-4. Price comparisons among countries.--Please compare market prices of purified CMC in the United States vis-a-vis market prices of purified CMC in each of the subject countries, and, if known, in individual third-country markets during January 2005-September 2010. Provide the bases for any price comparisons (f.o.b., delivered, etc.), and note the specific information as to price level, products, time period, and countries for each such price comparison.

PART IV.--PRICING AND MARKET FACTORS--Continued

Unless otherwise instructed, please answer questions in the rest of Part IV based on your firm's total U.S. sales of its U.S.-produced purified CMC to all U.S. customers during January 2005-September 2010. If your responses differ by sales to different types of U.S. customers (distributors, end users, or types of distributors/end users), by product specifications of the purified CMC that you produce domestically, or for any other reasons, please note such differences.

IV-5. **Length of sales period.**--Please estimate below the share of your firm's total U.S. commercial shipment quantity during 2009 of its U.S.-produced purified CMC that was on a (1) long-term basis (multiple deliveries for more than 12 months after the sales agreement), (2) short-term basis (multiple deliveries up to and including 12 months), and (3) spot sales basis (usually one-time delivery, within 30 days of the sales agreement). The three different sales bases include both oral agreements and written contracts.

Type of sale	Share of 2009 U.S. commercial shipment quantity (percent)
Long-term	_____
Short-term	_____
Spot	_____
TOTAL	<u>100 percent</u>

IV-6. **Long-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its U.S.-produced purified CMC on a typical long-term basis during January 2005-September 2010.

- (a) What was is the average duration of an agreement/contract? _____
- (b) Could prices be renegotiated during the agreement/contract period? Yes No
- (c) Did the agreement/contract fix quantity, price, or both? Quantity Price Both
- (d) Did the agreement/contract have a meet-or-release provision? Yes No

IV-7. **Short-term sales provisions.**--Please answer the following questions with respect to your firm's sales of its U.S.-produced purified CMC on a typical short-term basis during January 2005-September 2010.

- (a) What was is the average duration of an agreement/contract? _____
- (b) Could prices be renegotiated during the agreement/contract period? Yes No
- (c) Did the agreement/contract fix quantity, price, or both? Quantity Price Both
- (d) Did the agreement/contract have a meet-or-release provision? Yes No

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-8. **Price setting.--** How did your firm determine the prices that it charged for U.S. sales during January 2005-September 2010 of its U.S.-produced purified CMC (*check all that apply*)?

- Transaction-by-transaction Contracts
- Set price lists (if checked, include a copy of a recent price list)
- Reverse internet auction sales
- Other--Please describe: _____

IV-9. **Discount policy/practice.--** Please indicate and describe your firm's discount policies/ practices (*check all that apply*) involving domestic sales during January 2005-September 2010 of its U.S.-produced purified CMC; include in your discussion any discounts applied to purified CMC bundled with other products your firm sells (explain below). Please include discounts that your firm offered even though it may not have a stated discount policy. The one exception--do NOT include any payment discounts covered in IV-10a.

- Quantity discounts Annual total volume discounts No discounts
- Other--Please describe: _____

IV-10. **Pricing terms.--**Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its U.S.-produced purified CMC.

- (a) What were your firm's typical sales terms (*e.g.*, 2/10 net 30 days)? _____.
- (b) On what basis were your prices usually quoted? (Check one)
 F.o.b.--Please specify shipping point: _____ Delivered

IV-11. **Shipping information.--** Report below for your firm's U.S. commercial shipments during January 2005-September 2010 of its U.S.-produced purified CMC.

- (a) What was the approximate percentage of the total delivered price that was accounted for by U.S. inland transportation costs? _____ percent.
- (b) Who generally arranged the transportation to your customers' locations? (Check one)
 Your firm Purchaser.
- (c) What proportion of your sales was delivered within 100 miles of your production facility? _____ percent. Within 101 to 1,000 miles? _____ percent. Over 1,000 miles? _____ percent.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-12. **Lead times.**--What was your firm's share of its 2009 U.S. commercial shipments of its domestically produced purified CMC from inventory and produced to order and what was the average lead time between customers' orders and the date of delivery?

<u>Source</u>	<u>Share of U.S. commercial shipments in 2009 (Percent)</u>	<u>Lead time (days)</u>
From inventory	_____	_____
Produced to order	_____	_____
Total	100 %	

IV-13. **Geographical shipments.**-- What was the geographic market area in the United States served by your firm's U.S. shipments during January 2005-September 2010 of its U.S.-produced purified CMC? (Check all that apply)

Geographic area	√ if applicable
Northeast. —CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
Midwest. —IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
Southeast. —AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
Central Southwest. —AR, LA, OK, and TX.	<input type="checkbox"/>
Mountains. —AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
Pacific Coast. —CA, OR, and WA.	<input type="checkbox"/>
Other. —All other markets in the United States not previously listed, including AK, HI, PR, VI, among others.	<input type="checkbox"/>

IV-14. **Product/marketing changes.**--Have there been any significant changes in the product range, product mix, or marketing (including sales over the internet) of purified CMC in the United States during January 2005-September 2010?

No Yes

If yes, please describe and quantify if possible. Discuss the time periods when any such changes occurred, and the impact of any such changes on your firm's U.S. sales prices and quantities of its U.S.-produced purified CMC.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-15. **Anticipated product/marketing changes.**—Do you anticipate any changes in the product range, product mix, or marketing (including sales over the internet) of purified CMC in the United States in the future? Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue

No Yes—Please identify, including the time period.

IV-16. **End uses.**--Based on your firm's U.S. sales during January 2005-September 2010 of its U.S.-produced purified CMC, identify the principal direct downstream products associated with such sales and, to the extent possible, report the approximate percentage share of the total cost to produce each downstream product that was accounted for by the purified CMC.

<u>Downstream product</u>	<u>Share of total cost (percent)</u>
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IV-17. **Changes in end uses.**--Have there been any changes in the U.S. end uses or mix of end uses of purified CMC during January 2005-September 2010?

No Yes--Please describe.

IV-18. **Price effects among end-use sectors.**—Did a change in prices of purified CMC in one end-use sector affect prices of purified CMC in another end-use sector in the U.S. market during January 2005-September 2010?

No Yes.

If yes, please discuss and identify the purified CMC products and their associated end-use sectors, and the time period of any such effect.

IV-19. **Technical support/service provisions.**--

PART IV.--PRICING AND MARKET FACTORS--Continued

a) What technical support/service provisions were important for your firm's customers in your sales of its U.S.-produced purified CMC during January 2005-September 2010?

b) Were the technical support and service provisions priced separately for your firm's sales of its U.S.-produced purified CMC during January 2005-September 2010?

No Yes--Please explain.

IV-20. Cellulose preferences/requirements.—

a) Do cotton linters versus wood pulp, or some other form of cellulose, used as an input in the production of purified CMC, result in better quality and/or performance of the purified CMC?

No Yes--Please explain.

b) Did your customers ever specify/require the type(s) of cellulose to be used in the purified CMC that your firm produced for them during January 2005-September 2010?

No Yes

If yes, please explain below whether your firm, your customer, or both jointly determined the type(s) of cellulose used and why one form of cellulose was chosen over another form.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-21. Raw materials.—

a) Please describe any trends in the prices of the principal raw materials used by your firm to produce purified CMC during January 2005-September 2010 and the impact of such trends on your firm's selling prices and/or quantities of its purified CMC.

b) Does your firm expect the trends in these import prices to continue in the future?

No Yes

If yes, please explain below and identify the future time period of any changes.

IV-22. Changes in other factors affecting supply.—

a) Have any changes occurred in any other factors affecting supply (e.g., changes in availability or prices of energy or labor; transportation conditions; production capacity and/or methods of production; technology; export markets; or alternative production opportunities) of your U.S.-produced purified CMC in the U.S. market since 2005?

No Yes--Please note the time period(s) of any such changes, the factors(s) involved, and the impact such changes had on your shipment volumes and prices.

b) Do you anticipate any changes in the future in other factors affecting supply of your U.S.-produced purified CMC in the U.S. market?

No Yes--Please note the time period(s) and factors of any such changes.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-23 **Export constraints.**—Please describe how easily your firm could shift its sales of purified CMC between the U.S. market and export markets during January 2005-September 2010. In your discussion, explain if your firm's U.S.-produced purified CMC produced for export during January 2005-September 2010 was not useable/acceptable in the U.S. market, subject to long-term contracts and/or other supply provisions, or other commercial reasons that would have inhibited or prevented shifting some or all of these products to the U.S. market within a 12-month period during this period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

IV-24. **Barriers to trade.**—Were your firm's exports of purified CMC subject to any tariff or non-tariff barriers to trade in other countries during January 2005-September 2010?

- No Yes--Please list the countries and describe for each country any such barriers and any significant changes in such barriers that occurred during this period, or that are expected to occur in the future.

IV-25. **U.S. inventories.**--Please explain if your firm's U.S. inventories of its U.S.-produced purified CMC during January 2005-September 2010 were committed to customers by supply agreements, or other commercial reasons that would have prevented your firm from using some or all of this inventory to increase shipments to the U.S. market within a 12-month period during this period.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-26. Availability of supply (U.S.-produced).--

(a) Has the availability of U.S.-produced purified CMC in the U.S. market changed since 2005?

- No Yes--Please explain the circumstances and identify the time period of any such changes.

(b) Do you anticipate any changes in the availability of U.S.-produced purified CMC in the U.S. market in the future?

- Increase No change Decrease

If you anticipate changes in supply, please identify the changes, including the time period and the impact of such changes on shipment volumes and prices. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

IV-27. Availability of supply (nonsubject).—

(a) Has the availability of purified CMC imported from nonsubject countries in the United States changed since 2005?

- No Yes--Please explain.

(b) Do you anticipate any changes in terms of the availability of purified CMC imported from nonsubject countries in the U.S. market in the future?

- Increase No change Decrease

If you anticipate changes in supply, please identify the changes, including the country(ies) of origin, the time period, and the impact of such changes on shipment volumes and prices. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-28. **Cyclical/seasonal U.S. demand.**—Was total U.S. demand for purified CMC subject to any cyclical/seasonal fluctuations, product cycles, or other U.S. conditions of competition distinctive to purified CMC during January 2005-September 2010?

- No—Skip to the next question Yes

If yes—

(a) Please check below the type(s) of demand fluctuations and then discuss the nature and timing of these fluctuations during January 2005-September 2010. In addition indicate whether any business cycles result from changes in the overall economy and/or specific downstream sectors.

- Cyclical (longer than one year for complete cycle)
 Seasonal (within one year for complete cycle)
 Product cycle (completed within one year, or longer than one year—Check one)
 Other competitive condition(s) (specify _____)

Discussion: --In addition, identify, if applicable, peak and lowest demand months in a year.

(b) Have there been any changes in the business cycles or conditions of competition in specific U.S. sectors using purified CMC or for total purified CMC in the U.S. market since January 2005?

- No Yes-- Please describe.

(c) Explain how any U.S. cyclical/seasonal/other demand fluctuations affected your firm's selling prices and shipment quantities of its U.S.-produced purified CMC to the U.S. market at any time(s) during January 2005-September 2010.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-29. Demand trends.--

(a) How did total demand WITHIN the United States for purified CMC change during January 2005-September 2010? What principal factors affected changes in demand?

- Increased No Change Decreased Fluctuated

(b) How did demand OUTSIDE the United States (if known) for purified CMC change during January 2005-September 2010? What principal factors affected changes in demand? If applicable, identify specific foreign countries.

- Increased No Change Decreased Fluctuated

IV-30. Anticipated demand trends.--

(a) Do you anticipate any future changes in total demand for purified CMC WITHIN the United States?

- No Yes—Please describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

(b) Do you anticipate any future changes in demand for purified CMC OUTSIDE the United States? If applicable, identify specific foreign countries that you refer to.

- No Yes—Please describe and identify the time period. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-31. Substitutes in demand in the U.S. market for the subject purified CMC.—

Substitution in demand refers to products that can, based on market price considerations and household-consumer/industrial-user preferences or technical requirements, reasonably be expected to substitute for each other when the price of one product changes vis-a vis the price of the other product—some consumers/industrial users may require greater price changes than others before they switch among the alternative products.

a) Do substitutes (e.g., crude/unrefined CMC, CMC Fluidized Polymer Suspensions, cross-linked purified CMC, other hydrocolloids, etc.) for purified CMC exist in the U.S. market?

No Yes

If yes, please list in descending order of importance any products, other than the subject purified CMC, that may be substituted for purified CMC in the U.S. market during January 2005-September 2010. For each possible substitute product, please give examples of applications and end uses involving the substitute and indicate whether changes in the price of the substitute affect the price and/or quantity of purified CMC (also estimate the length of any time lag of such an effect).

Substitute product	Description of applications and end uses	Have changes in the prices of this substitute affected the price and/or quantity of purified CMC during January 2005-September 2010?
1.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
2.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
3.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
4.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>
5.		<input type="checkbox"/> No <input type="checkbox"/> Yes—Please explain. <hr/> <hr/>

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-31. Substitutes in demand in the U.S. market for the purified CMC.—Continued

b) Have there been any changes in the number or types of products that can be substituted for purified CMC or changes in the relative importance/mix of existing substitutes during January 2005-September 2010?

No Yes--Please explain.

c) Do you anticipate any changes in the number or types of products that can be substituted for purified CMC or changes in the relative importance/mix of existing substitutes in the future?

No Yes--Please describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

PART IV.--PRICING AND MARKET FACTORS--Continued

IV-32. Substitutes in demand in the U.S. market among types/grades of purified CMC.--

a) Do various types/grades of purified CMC substitute for each other in the U.S. market?

No Yes

If yes, please discuss below the extent to which purified CMC products could substitute for each other during January 2005-SeptemberJune 2010 and identify the end uses in which this substitution could occur. For each possible substitution discussed, please indicate the extent to which any such substitution actually occurred during January 2005-September 2010.

b) Do you anticipate any changes in the number or types of purified CMC products that can be substituted for each other or changes in the relative importance/mix of existing substitutes in the future?

No Yes--Please describe. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation that address this issue.

IV-33. **Market studies.**—Please provide as a separate attachment to this request any studies, surveys, etc., that you are aware of that quantify and/or otherwise discuss purified CMC demand and supply (the latter including production capacity and capacity utilization) in (1) the United States, (2) each of the other major producing/consuming countries, including Finland, Mexico, Netherlands, and Sweden, and (3) the world as a whole. Of particular interest is such data since January 2005 and forecasts for the future.

